

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

FRANKIE BROWN,)	
)	
Plaintiff,)	07 C 6490
)	
v.)	JUDGE DOW
)	
CITY OF MARKHAM and City of Markham)	
Police Officers HARRIS, D. Walker)	
(Star # 526), and UNKNOWN MARKHAM)	
POLICE OFFICERS)	
)	JURY TRIAL DEMANDED
Defendants.)	

**PLAINTIFF'S MOTION FOR LEAVE
TO FILE AN AMENDED COMPLAINT**

Now Comes Plaintiff, by and through his attorneys, Loevy & Loevy, and moves this Court for an Order granting him leave to file an amended complaint. In support, Plaintiff submits the following:

1. Plaintiff filed a twelve-count complaint alleging unlawful search and seizure following the search of his home and his subsequent arrest. Plaintiff named as Defendants the City of Markham, two Markham police officers, and unknown Markham police officers.
2. Plaintiff does not know the identity of every officer who unreasonably searched his home and the police reports documenting the search do not name them.
3. Nevertheless, via written and oral discovery, Plaintiff has been able to ascertain the identity of some of the previously-unknown police officers.
4. Accordingly, Plaintiff seeks to amend his Complaint to add as Defendants the other Markham police officers whom Plaintiff claims violated his constitutional rights. A copy

of the amended complaint Plaintiff seeks to file is attached as Exhibit A.

WHEREFORE, Plaintiff respectfully requests that this Court enter an Order granting him leave to file the amended complaint attached as Exhibit A.

Respectfully Submitted,

/s/Russell Ainsworth

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